

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

FILED
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CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:

FTX Trading Ltd., et al.,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)
(Jointly Administered)

NOTICE OF WITHDRAWAL OF EMERGENCY MOTION OF REBODEL IRA LLC
FOR DETERMINATION OF CLAIM STATUS

TO THE HONORABLE JOHN T. DORSEY, UNITED STATES BANKRUPTCY
JUDGE:

REBODEL IRA LLC, the claimant with respect to Claim No. 70619 (Scheduled Claim No. 6868557), respectfully withdraws its Emergency Motion for Determination of Claim Status and Request for Expedited Consideration previously submitted to the Court on April 9, 2025.

This withdrawal is based on the written representation from Debtors' counsel, Sullivan & Cromwell LLP, that:

- Claim No. 70619 is not subject to the 130th Omnibus Objection (Docket No. 28225);
- The KYC verification for this claim was completed before the deadline;
- And the claim will be determined as Allowed as of the record date of April 11, 2025, and eligible for payment in the next distribution.

Attached as Exhibit A is the email from Debtors' counsel confirming the above representations.

Respectfully submitted,
April 18, 2025



Rebecca Lynn O'Dell

Managing Member, REBODEL IRA LLC

Pro Se

Email: rebecca@stylsavvy.com

Phone: 415-205-7858

Exhibit A

Email from Sullivan & Cromwell LLP

Dated: April 18, 2025

Re: Claim No. 70619 – KYC Completion and Distribution Eligibility

From: Jensen, Christian P. jensenc@sullcrom.com
Subject: FTX - Rebodel IRA LLC claim
Date: April 17, 2025 at 10:26 AM
To: rebecca@stylsavvy.com
Cc: Mandel, Robert H. mandelr@sullcrom.com, McCrystal, John P. mccrystalj@sullcrom.com



Ms. O'Dell,

We are counsel to FTX Recovery Trust and are in receipt of the attached communication to the Bankruptcy Court styled as an emergency motion in response to the Debtors' objection to claim no. 70619. To set the record straight, Claim No. 70619 was listed on the Debtors' 130th omnibus claims objection [D.I. 28225] as a claim that had not completed the required customer KYC process and therefore may become subject to expungement if KYC was not started and completed before the requested deadlines set forth in the objection. As noted in your attached communication, you completed KYC verification with respect to such claim before the required deadlines. Your claim therefore is not subject to the 130th omnibus objection or the approving order entered by the Bankruptcy Court, and will not be subject to expungement pursuant to such order.

The confirmed Plan of Reorganization provides that unless "Allowed" in accordance with the Plan, all claims remain "Disputed." The Plan further provides that FTX Recovery Trust has until at least January 3, 2026 (one year after the Effective Date) to bring objections to Claims, which Claims Objection Deadline may be extended upon approval of the Bankruptcy Court. FTX Recovery Trust is in the process of reviewing and reconciling hundreds of thousands of claims, and no claimant is entitled to "jump the line" and demand expedited review. Therefore, FTX Recovery Trust does not believe there is any basis for you to seek to compel the Trust to determine your claim as Allowed before the Claim Objection Deadline has expired.

That said, given completion of your customer KYC and current status of review, FTX Recovery Trust would be in a position to determine your claim as Allowed as of the record date of April 11, 2025, in order to be able to make a distribution on such claim as of the next distribution date. FTX Recovery Trust requests that you notify the Bankruptcy Court you are withdrawing your "emergency motion" and upon receipt of such communication, can confirm that claim no. 70619 will be determined as Allowed and eligible for payment in the next distribution.

Best,
Christian

This e-mail is sent by a law firm and contains information that may be privileged and confidential. If you are not the intended recipient, please delete the e-mail and notify us

immediately.

**30112 - Emergency
Motion For Order...**

